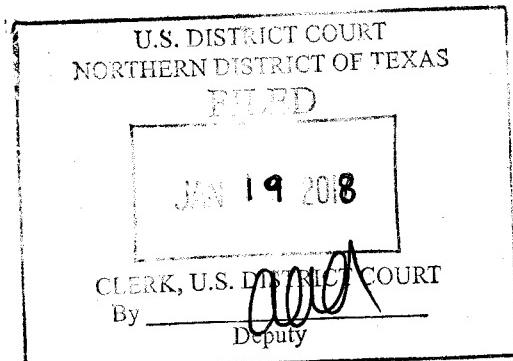


TRULINCS 48511086 - JAHANRAKHSHAN, KAMYAR - Unit: SEA-J-A

FROM: 48511086
TO: Hayden, Steven
SUBJECT: Letter to Judge Godbey
DATE: 01/01/2018 03:22:18 PM

9
January 2, 2018

The Honorable Judge David Godbey
United States District Judge
1100 Commerce Street, Room 1504
Dallas, Texas 75242-1003



United States Vs. JAHANRAKHSHAN, 3:17-CR-00414-N, Request to Expedite Trial Date

Dear Honorable Judge Godbey,

My name is Kamyar Jahanrakhshan (AKA Andrew Rakhshan). I am the Defendant in the above matter and you have been assigned to preside over my case. I am writing this letter in support of my Attorney's motion to expedite my trial, filed on December 22, 2017. I am asking that you kindly amend the Pretrial Order and move up my trial to a date in February 2018, or any other date earlier than the current March 19, 2018.

Prior to being transported to the Seagoville Federal Detention Center as an incarcerated Defendant, I had never physically been to the Northern District. In fact, I had never set foot anywhere in Texas, and have absolutely no tie to this State. I was brought here against my will shortly after I was arrested at my home in Seattle, Washington in July 2017. Unfortunately the Magistrate in the Western District of Washington denied my bond, and your Honor later upheld his detention order.

During the October 18th hearing to revoke the detention order, I testified before your Honor that I am innocent of this single-count indictment, and that I am extremely anxious to prove my innocence at trial which was then scheduled for November 13, 2017. I further asserted my right to a speedy trial, both under the 6th Amendment of the U.S Constitution and under the Speedy Trial Act, and I strongly objected to my November 13th trial date being vacated. I have always asserted that right from the first week of my arrest, and have never relinquished it.

But unfortunately, not only your Honor upheld the detention order, but you divested me of my Speedy Trial right and reset my trial to March 19, 2018 solely on the basis of Government's erroneous pretext that the case is "Complex". But the truth is, there is absolutely nothing complex about this single-count indictment. Contrary to government's motion to declare the case complex and your Order granting the same, the discovery is not "voluminous" and there is no "international evidentiary issues". Both myself and my attorney could significantly expand on this point if your honor agree to set our Motion to Expedite Trial for a hearing.

In any event, I have fully and diligently reviewed three productions of Discovery from the Government to this date, and in addition I have personally met with the lead AUSA and FBI agent assigned to my case on December 20, 2017. I feel confident that I am 100% fluent with the facts and evidence of this case, and am ready to go to trial at any moment to prove my innocence to the Jury. I am certain that the government too were ready at the moment of indictment.

I am reaching out to your honor and pleading with you to reconsider your Amended Pretrial Order dated October 26, 2017, and to move up my trial date to a week in February 2018. The government has conceded twice that they are available in February. They made that concession in their motion to declare the case complex, and during my meeting with them on December 20, 2017.

I have been incarcerated now for over 5 months for a crime that I did not commit. That unnecessary pretrial incarceration and the anxiety associated with it, combined with being held in a jurisdiction that I have absolutely no tie with, has taken its toll on me and my health.

I am once again asserting my constitutional right to a speedy trial under the 6th Amendment and Speedy Trial Act, and am pleading with your honor to grant my attorney's December 22nd motion to expedite my trial, and to move up its date to a week in February 2018, or to any date sooner than the current March 19, 2018. If other trials are scheduled before mine, perhaps the clerk could inquire with those parties as to whether they intend to proceed with their trial, and if they do not, my trial could take their spot.

TRULINCS 48511086 - JAHANRAKHSAN, KAMYAR - Unit: SEA-J-A

Yours Truly,

Andrew Rakhshan



January - 09 - 2018

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P.O. Box 9000
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NORTH TEXAS FEDERAL
DALLAS, TX 752



The Honorable Judge David Godfrey
United States District Court
1100 Commerce St. Room 1504
Dallas, TX 75242-1003

* Legal Mail *